



CAPCOA ENGINEERING MANAGERS COMMITTEE MEETING MINUTES

June 19, 2017: 10:00 am to 5:00 pm
June 20, 2017: 8:30 am to 12:00 pm

San Luis Obispo APCD

[HYPERLINK

"https://www.google.com/maps/place/375+Beale+St,+San+Francisco,+CA+94105/@37.7880121,-122.3937092,17z/data=!4m13!1m7!3m6!1s0x80858070ac3c2691:0x147d58cf1f55eacf!2s375+Beale+St,+San+Francisco,+CA+94105!3b1!8m2!3d37.7880121!4d-122.3915205!3m4!1s0x80858070ac3c2691:0x147d58cf1f55eacf!8m2!3d37.7880121!4d-122.3915205"]

Roberto Court, San Luis Obispo
Conference Room

MONDAY, June 19, 2017 (10:00 am)

Part 1 – Administrative Business

1.1. Introductions/Attendance List

<u>In Attendance:</u>	<u>By Phone:</u>
Brian Auger, San Luis Obispo County APCD	Alan Abbs, CAPCOA
Ben Beattie, Yolo-Solano AQMD	Brian Clerico , ARB
Jorge DeGuzman (Chair), Sacramento Metro AQMD	Mary Giraudo, MBARB
Dora Drexler, San Luis Obispo County APCD (Mon)	Tung Le, ARB (Mon)
Mike Goldman, Santa Barbara County APCD	David Lusk, Butte County AQMD
Sheri Haggard, MDAQMD	Lisa Peterson, El Dorado AQMD
Vickie Rausch, AVAQMD	Barry Young, Bay Area AQMD
Jim Swaney, San Diego APCD	
Laki Tisopulos, South Coast AQMD	
Dave Warner, San Joaquin Valley APCD	
Dave Whitney, San Luis Obispo County APCD	
Gary Willey, San Luis Obispo County APCD	
Kerby Zozula, Ventura County APCD	

1.2. Volunteer to Take Minutes: Mike Goldman volunteered to take minutes.

1.3. Additions/Changes to Agenda: Added item 8.05 for GHG Protocols, 8.7 for Records Retention Policies, and 5.4 for BACT.

1.4. Confirmation of upcoming meetings

Date	Host	
Jan 30-31, 2017	San Diego APCD	[HYPERLINK "https://www.google.com/maps/place/32%C2%B043N,117.1743177,17z/data=!3m1!4b1!4m5!3m4!1s0x0:0x0!8m2!3d32.72

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The meeting schedule was reviewed. The committee discussed meeting prior to the Symposium at Folsom City Hall or possibly at the Sacramento-Metro AQMD office.

- 1.5. Approval of prior Meeting Minutes - April 2017 Minutes: Dave Warner asked for modification of Section 4.2 to reflect the intent of their draft policy. David Lusk made the modification and the minutes were unanimously approved by the Committee.
- 1.6. Review of Action Items: The action item table was reviewed, completed items noted, and other items clarified.

Part 2 – ARB Updates– Tung Le

- 2.1. Oil and Gas Regulation

(a) Tung noted that the regulation was submitted to OAL on 6/2. A question was raised as to OAL's new process for performing quarterly reviews and the potential for delaying their approval of the regulation. Portions of the regulation requirements begin in 2018 with compliance milestones in 2019. ARB is looking at how to distribute the \$2.6 million the legislature allocated for program startup costs (e.g., training, equipment, database development). (b) The final draft MOA was sent out to the Districts for their review.
- 2.2. Title V/Clean Power Plan Workgroup Updates

The compliance strategy is being presented to the ARB Board this week for approval and subsequent transmittal to EPA. There are no requirements for the Districts at this time until EPA approves the Plan.
- 2.3. Landfill Regulation

Discussed under Section 5.2
- 2.4. Amending District Rules for E-Noticing

The group discussed ARB's draft internal advisory. The discussion centered on SB 288 issues. Clarification for the basis of the 5% EJ requirement was requested. Clarification of

ARB's specific scope for reviewing District NSR rule revisions was also requested. Concerns were raised that new review standards are being proposed.

2.5. SB49 - Possible Implications

The bill is being reviewed by three committees in the Assembly.

2.6. Interagency Waste Workgroup Updates

Evan Power is preparing a guidance document to assist project developers with applicable regulatory issues/requirements. ARB will be reaching out to the stakeholders. To help address the State's mandated recycling goals and permitting offset challenges, ARB was asked to review/analyze the option of adding an offsets exception to H&SC §42314 for composting operations that employ BACT level of controls.

LUNCH

Part 3 – EPA Updates

3.1. EPA Under New Administration – What to expect

No report.

3.2. Updates: 8-hr Ozone/Title V Petitions/SILs Guidance/Title V Emer. Affirmative Defense

No report.

3.3. Landfill NSPS

No report.

3.4. District's NSR Rules

No report.

Part 4 – PERP

4.1. Portable ATCM and PERP Changes

The hearing for the proposed regulatory changes was moved to November. They are still working through the issue of large projects (i.e., more than 2,500 bhp of engines) in extreme nonattainment areas. They are also working with the Department of Finance to obtain approval of the financial analyses. ARB is also drafting a new outreach Advisory notice.

4.2. Permitting of Self-Propelled Equipment

Dave Warner provided an updated on SJVAPCD's draft policy for self-propelled equipment. He noted the key element of the draft policy centered on the concept of "core functional identify" of the equipment. Their next step (late summer) will involve public outreach to affected facilities. They will require permit applications and will grandfather existing units from NSR. After that, new units will be subject to the NSR process.

BREAK

Part 5 – District /ARB/EPA Topics of Discussion

5.1. Air Curtain Incinerators (ACI)

- a. Emission Factor Study
SJVAPCD provide EPA their proposed emission factors for review.
- b. Delegation Option
Nothing new to report.
- c. Sample Local Evaluations & Permits
Committee members are requested to send the Chair examples.
- d. Sample Title V Permits
The Chair will work with Alan Abbs to post these examples to a folder on the CAPCOA webpage.

5.2. Landfill Regulation and [HYPERLINK "<https://www.gpo.gov/fdsys/pkg/FR-2016-08-29/pdf/2016-17700.pdf>"] – Rule vs Equivalency

- a. Landfill NSPS – 90 Day Stay?
In a May 5, 2017 [HYPERLINK "<https://www.gpo.gov/fdsys/pkg/FR-2017-05-31/pdf/2017-10752.pdf>"] and in the May 16, 2017 [HYPERLINK "<https://www.gpo.gov/fdsys/pkg/FR-2017-05-31/pdf/2017-10752.pdf>"], EPA has issued a 90-day stay to August 29, 2017.
- b. ARB Rule Equivalency
ARB Board adopted an [HYPERLINK "<https://www.arb.ca.gov/cc/landfills/docs/stateplan/stateplanfinal.pdf>"] between the [HYPERLINK "<https://www.arb.ca.gov/regact/2009/landfills09/landfillfinalfro.pdf>"] and EPA's regulation.
- c. Now What?
For now, Districts should continue as normal with implementing [HYPERLINK "https://www.ecfr.gov/cgi-bin/text-idx?node=sp40.7.60.c_0c"].

5.3. SB-49 – Updates?

The bill is currently “triple referenced” to three committees in the Assembly. CAPCOA is drafting a letter pointing out issues of concern (e.g., what “if” EPA developed newer & better regulations? Would we be forced to use the older regulations?).

5.4. BACT

- SJVAPCD discussed the experimental low NOx control technology used in oilfield steam generators. The Duplex Plug & Play [HYPERLINK "<http://36569f3nmeee287ywx2w57wm16mm.wpengine.netdna-cdn.com/wp-content/uploads/2017/04/OGJ-Reprint.pdf>"] uses a ceramic design by [HYPERLINK "<http://www.clearsign.com/>"]. The design uses premixed combustion, fuel-air mixture dilution and radiation cooling without the need for FGR or SCR. NOx results are in the sub-5 ppmv range using different fuels and operational savings are substantive due to increased fuel efficiency and lower capital/operating costs. SJVAPCD expects a permit application (non-experimental) soon.
- SJVAPCD is ramping up their process of revising their external combustion (boiler) BACT tables. It's part of their 5-year proactive BACT process. This will affect units rated at 5 MMBtu/hr or greater. They expect the new BACT standard for NOx to be

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5 ppmv. The release of the draft BACT table will occur in a few months.

- Jorge DeGuzman at Sac-Metro described their BACT process as well as their zero-BACT threshold. They are looking at ways to improve/streamline their process. Committee members are asked to send him your BACT policies, guidelines and/or tables.
- Dave Warner at SJVAPCD is interested in any BACT determinations developed for thermal oxidizers and/or flares (new or replacement units).

TUESDAY, June 19, 2017 (8:30 am)

Part 6 - Committee Updates and Board Assignments

6.1. GDF Sub-Committee

No report.

6.2. TARMAC Report/OEHHA Update - Dave Whitney (SLOAPCD)

- OEHHA. There are [[HYPERLINK "https://oehha.ca.gov/air/cmr/ethylene-glycol-n-mono-butyl-ether-egbe-rels-draft-scientific-review-panel-toxic-air"](https://oehha.ca.gov/air/cmr/ethylene-glycol-n-mono-butyl-ether-egbe-rels-draft-scientific-review-panel-toxic-air)] for Ethylene Glycol n-mono Butyl Ether ([[HYPERLINK "https://oehha.ca.gov/air/chemicals/ethylene-glycol-monobutyl-ether"](https://oehha.ca.gov/air/chemicals/ethylene-glycol-monobutyl-ether)]). They include an Acute REL, 8-hour REL, and a Chronic REL.
- ARB is looking for volunteers to assist them with their updates to the Gasoline Station Industrywide Risk Assessment Guidelines. This will be an update to the [[HYPERLINK "https://www.arb.ca.gov/ab2588/rrap-iwra/GasIWRA.pdf"](https://www.arb.ca.gov/ab2588/rrap-iwra/GasIWRA.pdf)] document.
- ARB is seeking input on aboveground tank emission factors for storage of gasoline.
- The AB 197 [[HYPERLINK "https://www.arb.ca.gov/ei/tools/pollution_map/"](https://www.arb.ca.gov/ei/tools/pollution_map/)] was released.
- ARB is updating their shore power *Airborne Toxic Control Measure for Auxiliary Diesel Engines Operated on Ocean-Going Vessels At-Berth in a California Port* ([[HYPERLINK "https://www.arb.ca.gov/ports/shorepower/shorepower.htm"](https://www.arb.ca.gov/ports/shorepower/shorepower.htm)]). Send any comments to Sanjeev Kamboj.
- Alan Abbs is in the process of finalizing the revisions to the AB 2588 Public Notification Guidelines document.
- NIOSH have evaluated the effects of the release of Diacetyl ([[HYPERLINK "https://pubchem.ncbi.nlm.nih.gov/compound/2_3-butanedione"](https://pubchem.ncbi.nlm.nih.gov/compound/2_3-butanedione)], an alpha diketone) during the coffee roasting process. NIOSH has [[HYPERLINK "https://www.cdc.gov/niosh/topics/flavorings/processing.html"](https://www.cdc.gov/niosh/topics/flavorings/processing.html)] RELs.
- TARMAC discussed impacts from use of the [[HYPERLINK "https://oehha.ca.gov/media/downloads/cmr/benzenereelsjune2014.pdf"](https://oehha.ca.gov/media/downloads/cmr/benzenereelsjune2014.pdf)] for acute risk at gasoline stations. Some Districts are observing increased acute HRA results at high throughput stations (e.g., Costco).

6.3. Board Liaison Report - Alan Abbs

- State [[HYPERLINK "http://www.ebudget.ca.gov/"](http://www.ebudget.ca.gov/)] (main budget and trailers) summary was provided.
- Implementation startup funds (\$2.6 million) provided for [[HYPERLINK "https://www.arb.ca.gov/regact/2016/oilandgas2016/oilandgas2016.htm"](https://www.arb.ca.gov/regact/2016/oilandgas2016/oilandgas2016.htm)].
- Provided \$1.5 million for [[HYPERLINK "https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB197"](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB197)] efforts for the [[HYPERLINK "https://www.arb.ca.gov/ei/tools/pollution_map/"](https://www.arb.ca.gov/ei/tools/pollution_map/)].
- The Carl Moyer Smog Check Bill ([[HYPERLINK "https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB1274"](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB1274)]) was adopted. This increases the smog check exemption period (the so-called grace period) from 6 years to 8 years, takes the extra \$24 fee (for years 7 and 8), and funds the Carl Moyer program. This will double to program's funding.
- [[HYPERLINK "https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB1132"](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB1132)],

the stationary source abatement bill will, if passed, allow (under special circumstances due to public health concerns) the APCO to shut down a facility without first obtaining Hearing Board approval.

- The Cap and Trade bill AB 378 failed in the Assembly.
- CAPOCA obtained a grant from EPA to coordinate a Personal Monitoring Symposium in the Winter of 2017. The focus will be on best practices for their use.

6.4. Enforcement Managers Update

No report.

Part 7 – Training / Symposium

7.1. 2017 Joint Engineering Enforcement Symposium Discussion

Tuesday November 7th will be the General Session day. Alan Abbs is leading this day's activities. CAPCOA obtained a CalEPA Grant to assist with Symposium costs. Up to 150 people are expected to attend. Day 1 will focus on CalRecycle issues such as Waste-to-Energy as well as EJ targeted enforcement. Possible Day 2 topics may include the following: EPA update, SB 2588 update, SB 49 discussion, enhanced portable monitoring, boiler/flare BACT, and permitting examples.

7.2. CAPCOA/ARB Training

Except for Sacramento and Diamond Bar, ARB's GDF classes were cancelled. The PERP classes were also cancelled. Someone brought up the idea of bringing back the training classes for the AB 2588 program. An [[HYPERLINK "https://www.arb.ca.gov/training/ctscalendar.php"](https://www.arb.ca.gov/training/ctscalendar.php)] ARB Training Calendar is available.

7.3. New Engineering Staff Training Syllabus

Kerby presented some tools that Santa Barbara uses for onboarding new employees. This included an article on the subject and a table for the first few weeks for a new engineer. The committee asked the table to be revised to be generic for use by any District.

BREAK

Part 8 – District Update / Issues:

8.05 ACR Wetlands Rx Protocol

ACR recently revised this protocol. CAPCOA has approved the prior protocol into the [[HYPERLINK "http://www.capcoa.org/ghg-rx/"](http://www.capcoa.org/ghg-rx/)] and needs the Engineering Managers to review this [[HYPERLINK "http://americancarbonregistry.org/carbon-accounting/standards-methodologies/restoration-of-california-deltaic-and-coastal-wetlands"](http://americancarbonregistry.org/carbon-accounting/standards-methodologies/restoration-of-california-deltaic-and-coastal-wetlands)]. Alex from Northern Sonoma AQMD volunteered for the task.

8.1. Pyrolysis Units: Toxics Emission Data

David Lusk received the information on which toxic pollutants to test (metals, PAHs, dioxins).

8.2. Selling Used Engines – David Lusk

Nothing new to report. David sent out Butte AQMD's draft for people to review.

8.3. District Permit Database Updates

- Sac-Metro discussed their database procurement vetting process.
- SLO provided the committee a demonstration of their permit database.
- South Coast has initiated Phase 1 of their development of an online permit application process focusing on gas stations, dry cleaners and auto body shops. Their goal is to issue permits online for projects that do not trigger offsets and/or school notice requirements.

8.4. Power Plant Permitting Updates –

- San Diego discussed their black start procedures for extended grid power outages where water supplies (for turbine water injection) are depleted. SDG&E raised concerns regarding their compliance status in these situations.
- South Coast discussed their Huntington Beach and Los Alamitos AES baseload facilities that were upgraded due to the once-through cooling regulations. Combined, both facilities generate 1,900 MW. NOx levels are permitted at 2 ppmv with an ammonia slip of 5 ppmv. The project also includes a 100 MW battery storage component.
- Antelope Valley reported that their Palmdale project is returning.

8.5. New BACT Determinations and Unique Permitting Activities

- South Coast discussed a medical waste pyrolysis project operating under a research permit. A source test was performed and HRA run with results of 1.7 in a million at the fence line. The medical waste is trucked in.
- South Coast inquired about how others handled mobile source refuelers. The company they are dealing with does not want to install Phase II controls due to the cost.
- Yolo-Solano inquired about BACT for a wood pallet manufacturer using a 20 MMBtu/hr drum drier fired on orchard trimmings.

8.6. Roundtable Discussion – Open Floor for Districts

San Diego described an AB 2588 HRA that resulted in a cancer burden > 1. The impact area (isopleth) covered a large swath of the city near the airport.